

EXHIBIT 306

GVI BY JEAN-PIERRE ORIOL 30(b)(6), Confidential
Gov. U.S. Virgin Islands vs JPMorgan Chase

July 07, 2023

1

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 CASE NO. 22-CV-10904

5 -----x

6 GOVERNMENT OF THE UNITED STATES V.I.,

7
8 Plaintiff,

9
10 vs.

11
12 JPMORGAN CHASE BANK, N.A.,

13
14 Defendant.

15 -----x

16 ***CONFIDENTIAL***

17 July 7, 2023

18
19 Confidential Remote Video-Recorded

20 30(b)(6) Deposition of

21 GVI BY JEAN-PIERRE ORIOL

22
23 Stenographically Reported By:

24 Mark Richman, CSR, CCR, RPR, CM

25 Job No. J9913116

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page.

MR. ACKERMAN: Okay.

A. No, nothing privileged.

Q. Okay. Could you read in that
half page of notes, just read it aloud,
please.

A. Sure. The --

MR. ACKERMAN: Objection. You
can go ahead.

A. Lieutenant Shelly-Ann Cannonier,
she's currently the director of
investigations for VIPD for the last two
and a half years. She's been with the
VIPD for 26 years. If the complaint was
lodged with VIPD a case number would
have been developed and generated. VIPD
asserts that there have been no
complaints made.

And then for me, what my
understanding of this proceeding is, is
that I'm prepared to answer questions on
investigations and investigation
monitoring steps.

Q. Is that all the notes?

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2 related to DPNR duties.

3 Q. So that's what I was getting at.

4 The subject matter of all of the six or
5 seven depositions, you were testifying
6 in connection with your work for DPNR?

01:19

7 A. Yes.

8 Q. Were you testifying in your
9 individual capacity or as a corporate
10 designee?

01:19

11 A. As an agent for the department.

12 Q. So do you understand today that
13 you've been designated as a witness
14 pursuant to Rule 30(b)(6)?

15 A. Yes.

01:19

16 Q. What is your understanding of
17 what that means?

18 MR. ACKERMAN: Objection.

19 A. That I am representing the GVI
20 and not just DPNR.

01:19

21 Q. So in your -- in the prior
22 deposition you gave in this case, you
23 testified in a personal capacity, but
24 here you're testifying as a
25 representative of the government,

01:20

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2 A. I would say that it's going
3 further from my, me personally going out
4 to the island having done investigation
5 work, but from a natural resource 01:21
6 perspective. And then if, again
7 speaking on behalf of the government,
8 that there were questions from VIPD and
9 whether or not they did any
10 investigations or monitoring. 01:21

11 Q. Okay. So I'm going to read you
12 the topic which is "investigations or
13 investigative or monitoring steps
14 concerning Epstein or his companies
15 undertaken by the Virgin Islands Police 01:22
16 Department or the DPNR that occurred
17 prior to December 1st, 2020."

18 Is that what you understand
19 you've been designated to testify about
20 today? 01:22

21 A. Yes.

22 Q. So it's really two topics, one is
23 about the VIPD's investigations and
24 monitoring prior to December 1, 2020 and
25 one is about DPNR's, correct? 01:22

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2 A. Yes, I understand.

3 Q. So let's start with the first
4 one, VIPD. Are you prepared to testify
5 on that topic today?

01:22

6 A. To the best of my ability, yes.

7 Q. And what did you do to prepare to
8 testify as to investigations or
9 investigative monitoring steps
10 concerning Epstein or his companies
11 undertaken by the VIPD?

01:22

12 A. Met with the Lieutenant
13 Shelly-Ann Cannonier who is the director
14 of investigations for the VIPD, and
15 asking if there was any investigations
16 into Mr. Epstein I guess prior to 2020.

01:23

17 Q. Do you know how long Lieutenant
18 Cannonier was the director of
19 investigations?

20 A. Two and a half years.

01:23

21 Q. Do you know if the information
22 that Lieutenant Cannonier provided to
23 you was based only on the two and a half
24 years or was it based on the full period
25 from December 1, 2020 backwards?

01:23

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2 A. So what I know is that the
3 purchase of Little St. James happened
4 around 1999.

5 Q. Okay. And then Mr. Epstein died 01:31
6 in approximately 2019, or in 2019,
7 correct?

8 A. Correct.

9 Q. So for approximately 20 years he
10 was a resident of the USVI? 01:31

11 MR. ACKERMAN: Objection, scope,
12 asked and answered, speculation.

13 A. Yeah, I don't know the -- I don't
14 know when he was actually claiming
15 residency here in the territory. I only 01:32
16 know when he purchased this property.

17 Q. He owned property on USVI for 20
18 years, correct?

19 A. Yes.

20 MR. ACKERMAN: Objection, scope. 01:32

21 Q. And during that 20-year period,
22 how many times did VIPD visit Epstein's
23 island?

24 A. I don't know that any visits were
25 made. 01:32

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2 Q. And no, during that 20 year span,
3 no complaints were received regarding
4 Epstein, correct?

5 A. That's correct. 01:32

6 Q. Beyond formal complaints, do you
7 know if there were any interactions
8 between VIPD and Epstein during that
9 20-year period?

10 MR. ACKERMAN: Objection. 01:32

11 A. No --

12 MR. ACKERMAN: Hold on,
13 Commissioner, let me just get my
14 objections in. Objection, scope,
15 form. Go ahead. 01:32

16 A. No, I do not.

17 Q. Do you know if VIPD had any
18 interaction with Epstein's companies?

19 MR. ACKERMAN: Objection, scope,
20 form. 01:33

21 A. No, I do not.

22 Q. Let's pull up tab 40 and enter it
23 as exhibit 1.

24 (Exhibit 1, document produced to
25 JPMorgan by the USVI titled 2010

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2 VI-JPM-000079601 was marked for
3 identification.)

4 A. Okay.

5 Q. This is an email chain that
6 starts with a July 16, 2019 email from a
7 Curt Devine of CNN.com and it asks
8 certain questions of the VI Police
9 Department including "Has US Virgin
10 Islands Police Department participated
11 in (or been asked to participate in) any
12 investigation related to Mr. Jeffrey
13 Epstein?"

02:03

02:03

14 Do you see that?

15 A. Yes.

02:03

16 Q. Do you know what the answer to
17 that question is?

18 A. Has the US Virgin Islands Police
19 Department received any complaints? So,
20 again, from what was reported to me,
21 that there were no complaints.

02:03

22 Q. Sorry, I was focused on the
23 second question which is has US Virgin
24 Islands police participated in or been
25 asked to participate in any

02:04

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2 Q. So this is a response by Glenn
3 Dratte to the CNN reporter and he's
4 reporting, "I did a complete check with
5 the VIPD criminal investigations bureau
6 and no complaints has been filed against
7 Mr. Jeffrey Epstein with the Virgin
8 Islands Police Department. If there's
9 anything further I can assist please
10 reach out to my office."

02:06

02:06

11 Do you see that?

12 A. Yes.

13 Q. So that is the answer as of July
14 18, 2019.

15 Do you know if subsequent to that
16 date there was any investigation?

02:06

17 MR. ACKERMAN: Objection, scope,
18 form.

19 A. No, I do not know. Or at least
20 what was reported to me was that there
21 was no investigation. There is no case
22 number that has been assigned with
23 anything related to Mr. Epstein, so --

02:06

24 Q. And that's -- that's --

25 A. So I would say no.

02:07

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2 Q. And that's ever, there's no date
3 restriction on that?

4 A. Well that I -- based on what was
5 reported to me as of this year, in them
6 looking back, that there is no case
7 number.

02:07

8 Q. Okay. Would there be any
9 investigation that wouldn't be assigned
10 a case number?

02:07

11 A. That I don't know. PD would have
12 to assign -- PD would have to indicate
13 that directly.

14 Q. Did you ask Lieutenant Cannonier
15 that question?

02:07

16 A. What Lieutenant Cannonier did
17 state is that if there was a complaint
18 received or that they were opening an
19 investigation, that there would be a
20 case number.

02:07

21 Q. Okay. So no USVI individual ever
22 came to VIPD to say they were a victim
23 of Jeffrey Epstein, correct?

24 A. To my understanding, that's
25 correct.

02:08

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2 Q. When you are conducting -- you or
3 other DPNR officials are conducting
4 investigations for DPNR, are you doing
5 that within the confines of DPNR's
6 jurisdiction?

04:07

7 A. Correct.

8 Q. If you saw suspicious activity
9 that was outside DPNR's jurisdiction,
10 would you or other DPNR investigators
11 have reported that activity to the
12 proper authorities?

04:07

13 A. Yes, that's correct.

14 Q. And does that include, by the
15 way, the visit to Epstein's island where
16 you saw Epstein with a woman?

04:08

17 A. Yes.

18 Q. Thank you. And earlier today
19 there was a, there was an exhibit with
20 Jason Marsh, it was an email and
21 attachment. Do you recall that set of
22 documents? It's exhibits 4 and 5.

04:08

23 A. I can go back to it. I mean I
24 know we saw a number of, a number of
25 emails that I think Jason was copied on.

04:08

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2 Q. Yes. I'm referring to the one,
3 the PDF title is 8 and 8A if you have
4 that.

5 A. Okay, yes. 04:09

6 Q. All right. 8, the part of the
7 exhibit that is exhibit 5, the one that
8 is titled 8A, how many pages is that PDF
9 document?

10 A. 48. 04:09

11 Q. And do you know whether Mr. Marsh
12 was forwarding only one article in the
13 Virgin Islands Daily News or whether he
14 was forwarding the entire paper?

15 A. I have no clue. 04:09

16 MR. O'LAUGHLIN: Objection.

17 Q. Do you know, do you know which
18 article in the 48 pages Mr. Marsh was
19 forwarding to this email address?

20 A. No, I have no clue. 04:09

21 Q. All right. We can put that
22 document aside. Commissioner Oriol,
23 that's all I have. Thank you very much.

24 THE WITNESS: Okay.

25 MR. O'LAUGHLIN: So we're going 04:10